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December 13, 2019

**VIA ECF**

Hon. Kenneth M. Karas  
United States District Court  
Southern District of New York  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601

Re: Galgano v. County of Putnam, et al.  
16-cv-03572 (KMK)

Dear Judge Karas:

We represent the Individual Putnam County Defendants Adam Levy, Andres Gil, Lourdes Gonzales and Henry Lopez. We write to respectfully request permission to file exhibits to our Motion to Dismiss the Second Amended Complaint containing Grand Jury minutes under seal. All parties have consented to this request.

While Justice Zuckerman of the Supreme Court, Putnam County had previously unsealed these records for the limited purpose of use in the instant litigation. Due to the confidential nature of the Grand Jury proceedings, and in order to be consistent with Magistrate Davison's September 20, 2018 Order that certain communications of plaintiff should be filed under seal, we are requesting permission to file the exhibits containing excerpts of the Grand Jury proceedings under seal.

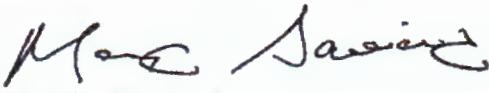
**MIRANDA SLONE SKLARIN VERVENIOTIS LLP**

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**HON. KENNETH M. KARAS**  
**DECEMBER 13, 2019**  
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We thank the Court for its consideration in this matter.

Respectfully Submitted,  
**MIRANDA SLONE SKLARIN VERVENIOTIS LLP**

  
Maurizio Savoardo

cc: All Counsel (via ECF)

*Granted,*  
*So Ordered-*  
*KMK*  
*12/16/19*